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August 26, 2015

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004-1408
gerber.chambers@nysb.uscourts.gov

**Re: In re Motors Liquidation Company, et al., Case No. 09-50026 (REG);
Sesay et al v. General Motors et al, 1:14-06018 (JMF); *Elliott, et al. v.. General
Motors LLC, et al.*, 1:14-cv-8382-JMF; *Sesay et al. v. General Motors LLC et al.*,
1:14-cv- 0618-JMF; *Bledsoe et al. v. General Motors LLC*, 1:14-cv-7631-JMF**

Your Honor:

I represent Counsel Celestine Elliott, Lawrence Elliott, Berenice Summerville, Ishmail Sesay, Joanne Yearwood, Sharon Bledsoe, Tina Farmer, Paul Fordham, Momoh Kanu, Tynesia Mitchell, Dierra Thomas and James Tibbs, plaintiffs in the above captioned actions. Ms. Bledsoe is a pre-closing accident victim; Ms. Farmer is a post-petition accident victim in a pre-petition vehicle. The other plaintiffs I represent in the above-captioned cases are economic loss claimants owning pre- and post-petition cars with a variety of ignition switch and non-ignition switch hazards. On their behalf, I write in response to the Court's Case Management Order of August 19, 2015. I request that this Court accept this submission after the close of business today. I was not included in meet and confer procedures and only learned of the other parties' positions after reviewing their filings today.

The *Elliott, Sesay*, and *Bledsoe* Plaintiffs concur with each of the points made in the letters submitted today by Designated Counsel for Economic Loss Plaintiffs and by Designated Counsel for Pre-Petition Accident victims. They reserve their rights to submit their own papers with respect to the identification of allegations in their complaints that New GM claims violate this Court's Judgment and with respect to any other issue that the Court deems worthy of further submissions, including the treatment of non-ignition switch independent claims. They concur with the other parties' agreements regarding scheduling of these matters.

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Respectfully submitted,

/s/ Gary Peller

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